

"UNDER SEAL"

FILED
CHARLOTTE, NC

NOV 15 2023

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA)	DOCKET NO. 3:23-cr-00005-RJC-DCK
)	
)	<u>SUPERSEDING</u>
)	<u>BILL OF INDICTMENT</u>
v.)	
)	Violations: 18 U.S.C. § 371
)	18 U.S.C. § 922(a)(6)
(1) KEYUON DIVINE CANNIE,)	18 U.S.C. § 922(d)
(2) TRASHAWN TAVARIS EDWARD)	18 U.S.C. § 922(g)
COLEMAN, aka "Tra")	18 U.S.C. § 932
(3) DAQUAN COLLINS, aka "Polo")	
and)	
(4) LAMAR MOORE)	
_____)	<u>UNDER SEAL</u>

THE GRAND JURY CHARGES:

COUNT ONE

(False Statement During Purchase of a Firearm)

On or about February 8, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(4) LAMAR MOORE,

in connection with the acquisition of a firearm, a Taurus, model G3C, 9mm semiautomatic pistol, from Hyatt Coin & Gun Shop, LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Hyatt Coin & Gun Shop, LLC, which statement was intended and likely to deceive Hyatt Coin & Gun Shop, LLC, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was the actual transferee/buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual transferee/buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

(Transfer of a Firearm to a Prohibited Person)

On or about February 8, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(4) LAMAR MOORE,

knowingly transferred a firearm, that is, a Taurus, model G3C, 9mm semiautomatic pistol, to a person, knowing and having reasonable cause to believe that the person had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(d)(1).

COUNT THREE

(Possession of a Firearm by a Felon)

On or about February 8, 2022, through March 10, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) KEYUON DIVINE CANNIE,

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, that is, a Taurus, model G3C, 9mm semiautomatic pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

(Conspiracy to Commit Offenses Against the United States)

From at least on or about July 1, 2022, and continuing through on or about July 23, 2022, in Mecklenburg County, within the Western District of North Carolina and elsewhere, the defendants,

- (1) KEYUON DIVINE CANNIE,
(2) TRASHAWN TAVARIS EDWARD COLEMAN, aka "Tra,"
(3) DAQUAN COLLINS, aka "Polo," and
(4) LAMAR MOORE**

knowingly and intentionally conspired and agreed with each other and with other persons known and unknown to the Grand Jury, to commit certain offenses against the United States, that is:

- a. to engage in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A); and
- b. to knowingly transfer, sell, trade, give, transport, or deliver any firearm to any person who the transferor knows or has reasonable cause to believe does not reside in the State in which the transferor resides, in violation of Title 18, United States Code, Section 922(a)(5).

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to purchase firearms in the State of North Carolina, to transport the firearms to the State of New York, and to sell those firearms to other individuals in the State of New York for profit.

OVERT ACTS

In furtherance of this conspiracy, and to affect the objects thereof, at least one of the co-conspirators committed at least one of the following overt acts, among others, in the Western District of North Carolina and elsewhere:

1. On or about July 8, 2022, **(2) COLEMAN** purchased a firearm for **(1) CANNIE**.
2. On or about July 8, 2022, **(1) CANNIE** and **(3) COLLINS** traveled from the State of North Carolina to the State of New York for the purpose of selling firearms to individuals for a profit.
3. On or about July 12, 2022, **(2) COLEMAN** purchased a firearm for **(1) CANNIE**.
4. On or about July 21, 2022, through July 23, 2022, **(1) CANNIE**, **(3) COLLINS**, and **(4) MOORE** made plans for **(4) MOORE** to transfer firearms to **(3) COLLINS**, which **(3) COLLINS** would then transport to the State of New York for the purpose of selling firearms to individuals for a profit.

All in violation of Title 18, United States Code, Section 371.

COUNT FIVE

(Straw Purchase of a Firearm)

On or about July 8, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(2) TRASHAWN COLEMAN,

did knowingly purchase a firearm, to wit: a Taurus, model G2C, 9mm semiautomatic pistol, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of Keyuon Devine Cannie, knowing or having reasonable cause to believe that Keyuon Divine Cannie intended to use, carry, possess or sell or otherwise dispose of the firearm in furtherance of a felony, to wit: dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A); in violation of Title 18, United States Code, Section 932(b)(2).

COUNT SIX

(False Statement During Purchase of a Firearm)

On or about July 8, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(2) TRASHAWN COLEMAN,

in connection with the acquisition of a firearm, a Taurus, model G2C, 9mm semiautomatic pistol, from Blackstone Shooting Sports, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Blackstone Shooting Sports, which statement was intended and likely to deceive Blackstone Shooting Sports, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was the actual transferee/buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual transferee/buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SEVEN

(Straw Purchase of a Firearm)

On or about July 12, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(2) TRASHAWN COLEMAN,

did knowingly purchase a firearm, to wit: a Taurus, model G2C, 9mm semiautomatic pistol, in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of Keyuon Devine Cannie, knowing or having reasonable cause to believe that Keyuon Divine Cannie intended to use, carry, possess or sell or otherwise dispose of the firearm in furtherance of a felony, to wit: dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A); in violation of Title 18, United States Code, Section 932(b)(2).

COUNT EIGHT

(False Statement During Purchase of a Firearm)

On or about July 12, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(2) TRASHAWN COLEMAN,

in connection with the acquisition of a firearm, a Taurus, model G2C, 9mm semiautomatic pistol, from Blackstone Shooting Sports, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Blackstone Shooting Sports, which statement was intended and likely to deceive Blackstone Shooting Sports, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was the actual transferee/buyer of the firearm indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual transferee/buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT NINE

(Possession of a Firearm by a Felon)

On or about July 12, 2022, in Mecklenburg County, within the Western District of North Carolina, the defendant,

(1) KEYUON DIVINE CANNIE,

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, that is, a Taurus, Model PT911 Millennium G2, 9mm caliber semi-automatic pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. § 924(d) and the statutes incorporated or referred to therein. The firearms and ammunition listed below are subject to forfeiture in accordance with § 924(d): all firearms and ammunition involved in, used, or intended to be used in the violations alleged in this bill of indictment. The Grand Jury finds probable cause to believe that the following property subject to forfeiture on the grounds stated above:

- (a) The following property seized on or about January 11, 2023: a Taurus, model G3C pistol, bearing serial number ACK452344;
- (b) The following property seized on or about July 23, 2022: a Taurus, model G2C, 9mm caliber semiautomatic pistol bearing serial number ADE309220; and a HS Produkt (IM Metal), model XDM ELite, 9mm caliber semiautomatic pistol bearing serial number 6019125; and
- (c) The following property seized on July 12, 2022: a Taurus, Model PT911 Millennium G2, 9mm caliber semi-automatic pistol, magazine, and ammunition seized on or about July 12, 2022.

A TRUE BILL


FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY

Regina Pack
REGINA HINSON PACK
ASSISTANT UNITED STATES ATTORNEY